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November 3, 2003

Ms. Victoria Rutson, Chief
Section of Environmental Analysis
Room 504
Surface Transportation Board
1925 K Street, NW
Washington, DC 20006

OFFICE OF ECONOMICS
U.S. DEPARTMENT OF TRANSPORTATION

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RECEIVED
U.S. DEPARTMENT OF TRANSPORTATION

Re: Finance Docket No. 34435: Ameren ERC, Inc., on behalf of a railroad to be formed --
Construction and Operation Exemption -- A Rail Line Between Coffeen and Walshville,
Illinois.

Dear Section Chief Rutson:

Pursuant to 49 CFR §1105.10(c), this letter is to request a waiver of the six (6) month prefiling notice generally required by 49 CFR §1105.10(a) for a proposed line construction project. Ameren ERC, Inc., on behalf of a soon to be formed railroad subsidiary, (collectively "Ameren ERC") plans to seek the authority of the Surface Transportation Board to construct a 12 ½ - mile rail line between Ameren's Coffeen Power Plant near Coffeen, Illinois to a connection with the Union Pacific Railroad ("UP") and a separate connection to the Burlington Northern Santa Fe Railway ("BNSF") both in the vicinity of Walshville, Illinois and all within Montgomery County, Illinois. Ameren ERC plans to include in its proposal a second alternative to build a five mile rail line that could be built instead of the 12½ mile line only if Ameren ERC is successful in acquiring an existing rail line. This five mile alternative crosses Montgomery County and Bond County, Illinois. Ameren ERC submits that the waiver of the six month prefiling notice is appropriate for several reasons.

Ameren ERC recently met with SEA staff on October 7, 2003, to preview the forthcoming petition and to discuss the need for environmental review. Ameren ERC is currently reviewing SEA's list of third party contractors and hopes to request SEA's selection and approval of a third party contractor for the project in the immediate future. Moreover, Ameren ERC has no reason to believe that the timing of its petition will prejudice the ability of any party to participate in the thorough review of its petition. Consequently, Ameren ERC believes this advance notice lessens the need for a six-month prefiling notice.

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More importantly, Ameren ERC has been working with an engineering and design firm to assist Ameren ERC in selecting proposed routes for its petition which will minimize the potential for environmental impacts. The proposed preferred route will travel along existing previously disturbed rights-of-way corridors, following the path of Norfolk Southern's existing rail line for a portion of the route, and following power transmission lines for substantially all of the rest of the route. By building in existing utility corridors, most of the environmental impacts associated with construction in undeveloped areas will be eliminated. The surrounding area is primarily farmland, and use of the existing right-of-way corridor would greatly mitigate any potential harm to local farmers and their lands.

In addition, the preferred route was chosen for its minimal length, avoidance of roads, distance from dwellings, schools, hospitals and other structures, and minimal number of other sensitive resources traversed such as waterways, wetlands, and undeveloped land. Finally, a second alternative route consisting of five miles of new construction will also be proposed in the petition in the event that Ameren ERC is able to purchase an existing rail line to connect with the five mile new construction which would further minimize the environmental impacts.

These facts, taken together, suggest that Ameren ERC's forthcoming rail line construction petition will not require a lengthy or complex environmental review. Accordingly, this justifies a waiver of the six (6) month pre-filing notification requirement. Ameren ERC thus respectfully requests the Board to grant a waiver of the six (6) month written notice requirement.

If you have any questions regarding this request or if I can otherwise be of service, please do not hesitate to call me at (202) 274-2959.

Sincerely yours,



Sandra L. Brown

cc: David Navecky
Glennon Hof